

## REMARKS

Claims 1-22 are pending in the present application. Reconsideration of the claims is respectfully requested.

### I. 35 U.S.C. § 102, Anticipation

The Office Action rejects claims 1-22 under 35 U.S.C. § 102(e) as being anticipated by Wolff et al. (U.S. Patent No. 6,044,367). This rejection is respectfully traversed.

As to independent claim 1, the Office Action states:

As to claim 1, Wolff discloses a method for executing a function on a server in a distributed data processing system, the method comprising the computer-implemented steps of:

Receiving a request for a function (I/O functions), wherein the request comprises an input specifying a server name, wherein the server responds to requests directed to a set of server names (plurality of servers 104A-106A of fig. 1A), and executing the function in a server name context on the server as directed by the input specifying the server name (see abstract, Figs. 1A, 2A, 3A, col. 4 line 14 to col. 5 line 67, col. 6 line 31 to col. 7 line 58).

Claim 1, which is representative of the other independent claims 12 and 21 with respect to similarly recited subject matter, reads as follows:

1. A method for executing a function on a server in a distributed data processing system, the method comprising the computer-implemented steps of:

receiving a request for a function, wherein the request comprises an input specifying a server name, wherein the server responds to requests directed to a set of server names; and

executing the function in a server name context on the server as directed by the input specifying the server name.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983).

Applicant respectfully submits that Wolff does not teach every element of Applicant's claimed invention. Specifically, the Wolff reference does not teach "wherein the server responds to requests directed to a set of server names; and executing the function in a server name context on the server as directed by the input specifying the server name" (emphasis added), as recited in claim 1. Applicant respectfully submits that the Office Action is focusing on broad teachings of the Wolff reference and not on whether claim 1 reads on the prior art system, as detailed hereafter.

Wolff teaches a distributed I/O store in which clients may access a resource through different paths. The Wolff system provides for an "aware" client as shown in Figure 2B, that includes a name driver 194 that is utilized by a fail-over module 188 and a load balancer module 190. The name driver module 194 maintains "an abstraction mapping of the network namespace resources, and [combines] all available paths for each volume to each node as a single computing resource available for use by the rest of the system." The load balancer module 190 calls the name driver module 194 to remap future I/O while the fail-over module 188 calls the name driver module 194 to retry I/O on another path (column 12, lines 42-55).

The network namespace resources are presented in the network namespace as part of a logical namespace and a physical namespace. The logical namespace presents a persistent view of the resources on the network. The physical namespace presents the individual physical connection points used at any particular time to service the logical resources.

Thus, the name driver module 194 is used as a mechanism for identifying other nodes in the network to which requests are directed. That is, the name driver module 194

is used to determine other nodes to which requests will be remapped for future I/O by the load balancer module 190 and nodes along another path that may be tried by the fail-over module 188. The name driver module 194 does not include a set of server names for which the current server responds to requests. In actuality, the name driver module 194 of Wolff is the exact opposite and identifies other nodes to which requests should be directed, not which requests should be handled by a current server based on a set of server names which the current server responds to.

Furthermore, the “aware” client is not a server and is not a server that executes a “function in a server name context on the server as directed by the input specifying the server name.” Moreover, the servers that are taught by Wolff do not include a name driver module and do not have an associated set of server names. There is no mention that any of these servers have a set of server names identifying which requests the server responds to. There is further no mention that a server in Wolff executes a function in a server name context on the server as directed by an input specifying the server name. Since Wolff does not teach a set of server names, there is no reason to execute functions in a server name context on Wolf because there is no ability to switch context in the Wolff system.

The Office Action seems to suggest, although the Office Action fails to explain what elements of Wolff it considers similar to the claimed features, that simply because Wolff mentions a namespace and a name driver module, that somehow this general teaching rises to the level of anticipating the specific feature of a server having a set of server names to which it responds and executes functions in server name contexts. This leap in interpretation of Wolff is not supported by the actual teachings of Wolff. Rather, this interpretation is taken completely from hindsight reconstruction having had the benefit of Applicant’s disclosure. The Examiner is reading in teachings to the Wolff reference that simply are not there.

As noted above, Wolff teaches the opposite of the claimed invention in that the name driver module, which is in the “aware” client, identifies other nodes to which requests should be routed based on the network namespace and does not identify a set of server names for which a current server responds to requests. Furthermore, Wolff does

not teach executing a function in a server name context because neither the “aware” client nor the servers in Wolff execute any functions in a server name context.

Thus, Applicant respectfully submits that Wolff does not teach each and every feature recited in claim 1 as is required under 35 U.S.C. § 102(e). Independent claims 12 and 21 recite similar features in their respective apparatus and computer program product contexts, and thus, Wolff does not teach each and every feature of these claims for similar reasons as noted above with regard to claim 1. At least by virtue of their dependency on claims 1, 12 and 21, respectively, Wolff does not teach each and every feature of dependent claims 2-11, 13-20 and 22. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 1-22 under 35 U.S.C. § 102(e).

In addition to the above, Wolff does not teach the specific features set forth in dependent claims 2-11, 13-20 and 22. For example, with regard to claim 3, Wolff does not teach identifying a membership of a resource within the set of resources for the server name context. As noted above, Wolff does not teach a server name context and therefore, cannot teach identifying a membership of a resource within the set of resources for the server name context.

The Office Action alleges that this feature is taught at column 6, lines 1-64 and column 7, line 17 to column 8, line 65. However, these sections of Wolff only teach that a single server controls the administrative functions for a resource and that load balancing may be performed in which the administrative functions may be migrated to another server based on the configuration database records for all the volumes and active nodes in the system. There is no teaching, or even mention, of a set of server names, executing a function in a server name context, or identifying a membership of a resource within a set of resources for the server name context.

The Office Action has not shown with particularity what the Examiner believes is equivalent to the features recited in the claim. Rather, the Office Action points to large sections of the reference and expects Applicant to guess at what the Examiner intends. Such an approach does not support a rejection based on anticipation under 35 U.S.C. § 102(e).

Thus, in view of the fact that the Office Action has not met its burden to show with particularity what elements in Wolff are believed to be the same as the features

recited in the claims, and the fact that Wolff in actuality does not teach any of the features of claim 3, Applicant respectfully asserts that Wolff does not anticipate claim 3.

Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 3.

As to claim 4, Wolff does not teach generating a server name tag for the server name, wherein the membership of the resource in the set of resources is identifiable by the server name tag associatively stored with the resource. The Office Action again points to the same section of Wolff as discussed above with regard to the rejection of claim 3 as allegedly teaching this feature. Again, the Office Action does not state what the Examiner believes is the same as Applicant's claimed features but rather leaves it to the Applicant to guess at the reasoning of the Examiner. Again, there is nothing in these sections of Wolff, or any other section of Wolff, that teaches a server name tag or identifying membership of a resource in a set of resources by the server name tag. The Office Action has not met its burden to show anticipation by the Wolff reference. Therefore, Applicant respectfully requests withdrawal of the rejection of claim 4.

With regard to claim 5, Wolff does not teach a server name tag being generated based on a value of the server name and a value derived from a data structure that stores a server name. The Office Action alleges that this feature is taught in Wolff in Figure 1B, column 5, line 56 to column 8, line 24 and column 15, line 61 to column 16, line 45. However, these sections of the Wolff reference do not make any mention whatsoever of a server name tag or the server name tag being generated based on a value of a server name and a value derived from a data structure that stores a server name. Yet again, the Office Action merely points to large sections of a reference and alleges that its taught somewhere in these sections. None of these sections have anything to do with the features recited in claim 5. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 5 under 35 U.S.C. § 102(e).

As to claim 6, Wolff does not teach that a value derived from the data structure is a position value of the server name within a server name table that stores the set of server names. The Office Action alleges that this feature is taught in Figures 5A-B, column 19, line 32 to column 21, line 33 and column 23, lines 12-54. Again, the Office Action references large sections of the Wolff reference without any guidance as to what the Examiner may be considering the same as the features of the present claim. While these

sections may illustrate node names, there is no teaching or suggestion as to how such node names are derived. Thus, Wolff does not teach a value being derived from a data structure wherein the value is a position value of the server name within a server name table. Applicant respectfully requests withdrawal of the rejection of claim 6 under 35 U.S.C. § 102(e).

As to claim 8, Wolff does not teach locating the server name in an entry of a server name table, obtaining a location index for the entry, or generating a server name mask based on the location index. The Office Action alleges that these features are taught in Tables 6 and 7, column 17, line 43 to column 18, line 36 and column 33, line 9 to column 35, line 33. As with all of the rejections of the other claims, the Examiner has not stated with particularity what elements of the reference the Examiner considers to be the same as the features recited in claim 8. There is no mention in these sections, or any other section of Wolff, of locating a server name in an entry of a server name table, obtaining a location index for the entry, or generating a server name mask based on the location index. Applicant respectfully requests withdrawal of the rejection of claim 8 under 35 U.S.C. § 102(e).

As to claims 9-11, as noted above, Wolff does not teach server name masks. Therefore, Wolff cannot be found to teach the specific features recited in claims 9-11 that reference server name masks. None of the sections cited in the rejections of claims 9-11 provide any further teaching with regard to server name masks than the section cited above in the rejection of claim 8. Again, the Office Action fails to provide any incite into what the Examiner considers the same as Applicant's claimed features but rather relies on Applicant to make guesses at what the Examiner's reasoning may be. Claims 9-11 are simply not taught by Wolff. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 9-11 under 35 U.S.C. § 102(e).

Claims 12-20 were rejected for the same reasons set forth with regard to claims 1-6, 8, 9, and 10, respectively. Therefore, Applicant traverses this rejection for the same reasons as noted above with regard to claims 1-6, 8, 9 and 10.

Applicant respectfully urges that the Examiner must show with particularity what elements in the reference the Examiner considers the same as the features recited in the claim. The Examiner has not done this in the rejection of any of the claims in the present

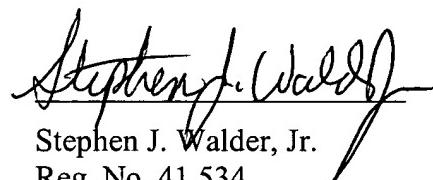
Office Action. This is because the Wolff reference, in actuality, does not teach any of the features of the pending claims. Applicant therefore respectfully requests withdrawal of the rejection of all of claims 1-22 under 35 U.S.C. § 102(e).

II. Conclusion

In view of the above, Applicant respectfully submits that all of the claims are allowable over the cited art and that the application is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

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